UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 0:16-CV-61511-WJZ

CAROL WILDING, et al.,

Plaintiffs,

v.

DNC SERVICES CORP., d/b/a
DEMOCRATIC NATIONAL COMMITTEE,
et al..

Defendants.

DEFENDANTS' MOTION TO DISMISS FOR INSUFFICIENT SERVICE OF PROCESS OR, IN THE ALTERNATIVE, EXTEND TIME TO ANSWER OR RESPOND TO COMPLAINT

Defendants, by and through their undersigned attorneys, pursuant to Federal Rules of Civil Procedure 4(e) and (h) and 12(b)(5), and, in the alternative Federal Rule of Civil Procedure 6(b)(1) and S.D. Fla. L. R. Civ. P. 7.1(a)(1)(J), DNC Services Corp. d/b/a the Democratic National Committee ("DNC") and DNC Chair U.S. Congresswoman Debbie Wasserman Schultz (together, "Defendants") respectfully move the Court for an order (1) dismissing this action for insufficient service of process, or (2) extending Defendants' time to answer or otherwise respond to the Complaint until September 9, 2016 or two weeks after the Court rules on this motion, whichever is later. Defendants submit the attached memorandum of law in support this Motion. Consistent with S.D. Fla. L. Civ. R. 7.1(a)(1) and Section 31(6) of the CM/ECF Administrative Procedures, a proposed order granting the relief requested is also filed together with this motion and has been submitted via e-mail to the Court.

Dated: July 22, 2016 Respectfully submitted,

s/Gregg Thomas

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s/Marc E. Elias

Marc E. Elias (motion for *pro hac vice* to be filed) Graham Wilson (motion for *pro hac vice* to be filed) Elisabeth C. Frost (motion for *pro hac vice* to be filed)

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Dismiss For Insufficient Service of Process or In the Alternative To Extend Time to Answer or Respond to Complaint was served by CM/ECF on July 22, 2016 on all counsel or parties of record on the service list.

Gregg D. Thomas Attorney

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